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Attorneys for Plaintiffs

## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

## MEDFORD DIVISION

GREATER HELLS CANYON COUNCIL, OREGON WILD, CENTRAL OREGON LANDWATCH, SIERRA CLUB, GREAT OLD BROADS FOR WILDERNESS, and WILDEARTH GUARDIANS,

Plaintiffs,

v.

HOMER WILKES, in his official capacity as Undersecretary for Natural Resources and Environment; GLENN CASAMASSA, in his capacity as Regional Forester for Region 6; and the UNITED STATES FOREST SERVICE,

Defendants,

AMERICAN FOREST RE-SOURCE COUNCIL, and EAST-ERN OREGON COUNTIES AS-SOCIATION,

Defendants-Intervenors.

Case No. 2:22-cv-00859-HL

DECLARATION OF MATHIEU FEDERSPIEL

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- I, Mathieu Federspiel, declare as follows:
- My name is Mathieu Federspiel. I reside in Powell Butte, Crook County,
   Oregon.
- 2. I am a member of the Sierra Club and have been for over 40 years. For the past 8 years or so, I have been a volunteer member of the Executive Committee of the Juniper Group, Oregon Chapter Sierra Club. The mission of the Juniper Group is to preserve Central and Eastern Oregon's environment, natural resources, and quality of life. I support this organization because of the important work they do for environmental education and protection of the environment. I have a Master's in Environmental Science, so I am knowledgeable about the interconnected nature of our environment and how mismanagement of our forests and lands has damaged so much of it, and this work is important for this planet and humanity.
- 3. I am a member of Great Old Broads for Wilderness and have been one for about 8 years. The Broads' mission is to preserve and protect wilderness and wild lands. For the past year I have been a volunteer on the leadership team for the Bitterbrush Broadband out of Bend, Oregon. I support this organization because of the important work they do for environmental education and protection of the environment.
- 4. I am a member of Oregon Wild and have been so for about 5 years. The mission of Oregon Wild is to protect and restore wildlands, wildlife, and waters as an enduring legacy for future generations. I support this organization because of the important work they do for environmental education and protection of the environment.
- 5. When learning about the planned revision to the Eastside Screens I became involved representing the Sierra Club. On July 10, 2020, I submitted a letter to Glenn

Casamassa, Regional Forester, U.S. Forest Service, Pacific Northwest Region, from the Sierra Club. We voiced our opposition along with other conservation groups to the Eastside Screen revision process. Again, on September 2, 2020, I submitted comments to the U.S. Forest Service regarding PRD 710229, Project 58080, Forest Management Direction for Large Diameter Trees in Eastern Oregon. We pointed out several problems with this preliminary EA and voiced opposition. The Forest Service never responded to these comments or provided any further opportunity for public involvement and/or administrative appeal.

- 6. Since the decision to adopt Screens Amendment, I have been tracking implementing projects. On behalf of the Sierra Club, I have submitted specific comments and/or signed on to coalition comments on the following projects: Cliff Knox (50433), Sunflower (56602), Neighborhood Wildfire Resiliency (57290), and Ellis (41350). The Sierra Club's organizational interests would be harmed if these projects move forward with a large-tree-logging component as such action is detrimental to the environment, including climate change, and to our quality of life which includes having large trees on our landscape..
- 7. I am a recreational user of public lands and frequently use our national forests for hiking, backpacking, camping, backcountry skiing, mountain biking, birding, and general enjoyment of nature and mental relaxation. One specific example: Since my I moved to Powell Butte, I have frequented the Ochoco National Forest and have hiked all of its designated hiking trails. Over my life so far, I have also hiked, birded, and camped in the Wallowa, Strawberry, Steens, and Umatilla National Forests, all of which are affected by the Screens Amendment.
  - 8. All my experiences in the forest are enhanced and, in fact, fundamentally

depend upon the existence of large trees. Large trees and old trees have significant impact upon my enjoyment of being in the forest, for their visual appearance most directly and the mental astonishment they provide to see and touch an organism that can grow that large, that tall, and that old. Beyond this impact, the trees are indirectly even more important for the contribution they make to the ecosystem. Without these trees, the whole ecosystem of the forest changes. Without these trees, the microclimates around them no longer exists, the grandeur is absent, their contribution to duff, insect life, habitat for birds and other organisms is absent or severely depleted, and the whole food chain and ecosystem is changed, including water cycles and fire cycles.

- 9. It is extremely important to me to know that large trees, for which our region is known, will continue to exist in the future and will be protected. This state, this country, and this planet would be a lesser place without them and knowing they are no longer improving our world would negatively affect my mental state. I dread the thought of this region losing its Redwoods, its Ponderosa Pine, its great Douglas Fir and White Fir because without them we also lose the salmon and other great species that complete this world.
- 10. The proposal of the Forest Service to cut more large trees causes me angst and mental stress because I value the experience of spending time amidst these trees and the forest ecosystem that supports them. The removal of large trees reduces my enjoyment of the forest because the grandeur and beauty of these trees is missing. The removal of large trees threatens my health because the ecosystem services they provide will be missing. The removal of large trees threatens my future health and well-being because they will no longer be around to store carbon and reduce the impact of the climate crisis on me and future generations.

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- 11. The removal of large trees affects my interests in visiting areas of the forests. The recent removal of large trees in the West Bend project by the Deschutes National Forest has changed my desire to visit that area of the forest. I prefer to visit areas where natural processes are at work, rather than areas with cut stumps.
- 12. The removal of large trees changes the wildlife and vegetation of an area. The loss of elk safety areas, of nesting and feeding habitat for woodpeckers and other birds, the loss of downed timber for wildflowers, fungi, and insects, all of this and more changes with the removal of large trees. The large trees are also mother trees to help the next generation of trees take hold and thrive.
- 13. When I lived on the west side of Oregon, I drove a lot of forest service roads and saw a lot of clearcuts. While this is an extreme example of the removal of large trees, it did provide me with the experience of seeing the difference between an industry cut forest and be able to compare it to natural processes of blowdown and patchy fire-scarred landscapes. This comparison is valid on the forests of eastern Oregon where large trees are now threatened. The industrial clearing, or restoration treatment as it is called, is different than what is seen from natural fire on the landscape. I feel the difference innately as something wrong.
- 14. In the Mill Creek watershed of the Ochoco National Forest, I frequent not only the Mill Creek Wilderness, but also the Giddy-Up-Go trails and the Steins Pillar trail. I visited the Giddy-Up-Go trail (West side of project area with overlooks into the project area) in 2020, and last walked the Steins Pillar trail (East side of project area) in 2021. I also walked the Wildcat Trail (East side of Mill Creek Wilderness) in 2019 which has a lower segment in the project area, and upper segments with views of the wilderness as well as into

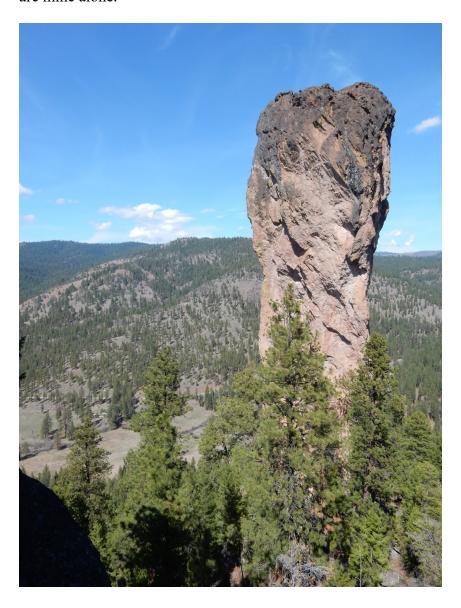
some sections of the project area. These trails offer great hiking as well as scenic vistas.

There are some beautiful large trees as well as openings with Mountain Mahogany and wildflowers.

- 15. In the area of the North Fork Crooked River, southeast of Big Summit Prairie, I have enjoyed lunch in the Deep Creek campground and driven some of the side roads (including the 4240 and 4280) to enjoy some of the scablands as well as the beautiful forests in this section of the forest. I was last in this area in summer of 2021. (The current road closure of the 42 makes access difficult at this time. Much of this area is seldom visited except for hunters and ranchers and thus valuable for solitude.
- 16. If the court decided to restore the previous prohibition on logging all large trees, it would protect my and the Sierra Club's interests in the beauty of the forests and the continued environmental benefits that I enjoy on my visits. I would be able to watch the forest function as a healthy forest, with all the wildlife and plants that are important to this functioning. I and the Sierra Club would be secure in the knowledge that the Forest Service was protecting the health of the forest for future generations as well as the benefit of current citizens. Overturning the Screens Amendment also would further the Sierra Club's interests in thoughtful and transparent decision-making; the rushed and opaque Screens Amendment process was exactly the opposite of this objective.
- 17. I plan to continue to visit these forests. I recently backpacked in the Lostine area of the Wallowa Mountains. Other plans for camping this summer in Malheur National Forest were cancelled due to the drought. I will be visiting other forests as I have the opportunity to. My summers usually include many visits to the Ochoco National Forest as well. I intend to visit Steins Pillar again this fall, and will access the Mill Creek Wilderness

from the Wildcat Campground in the project area again this fall as well.

- 18. If called upon, I could testify to the statements in this document.
- 19. I have included below some photographs that were taken by me over various years at previous locations in the Ochoco National Forest. They accurately represent the conditions at each of the locations at the time they were taken. The accompanying statements are mine alone.



Steins Piller, April 2016

7 DECLARATION OF MATHIEU FEDERSPIEL This is in the Mill Creek watershed. Note the sparse, dry forest on the opposite hillside. The forest on this side of the canyon is thicker, showing the diversity of environments in this forest, as well as effects of past history.



Black Canyon Wilderness, August 2018
This wilderness on the east side of the Ochoco National Forest has areas recovering from a fire.
This adds diverse vegetation for wildlife, as well as standing and downed wood for insects, fungi, and nutrients.



Mill Creek Wilderness, August 2019
This wilderness in the Mill Creek watershed of the Ochoco National Forest also had a fire. This photo shows recovering areas with strong regrowth as well as the patchy nature of a fire scared landscape.



Rock Creek Trail, October 2019

This landscape on the north side of the Ochoco National Forest has diverse tree species. The larches are standing out in this photo with the fall yellow color. This area has some dense forest as well as sparse areas; this photo was taken from a rocky outcrop above the creek.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 31st day of May 2022 in Powell Butte, Crook County, Oregon.

Mathieu Federspiel

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